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13	Los Angeles, CA 90017	Facsimile: (202) 538-8100
	Telephone: (213) 443-3000	(= -=, -=
14	Facsimile: (213) 443-3100	
15		
16		
1.7	Counsel for Defendant Google LLC	
17	Additional counsel on signature pages	
18	UNITED STATES	DISTRICT COURT
19	NORTHERN DISTRICT OF CAL	LIFORNIA, OAKLAND DIVISION
20	CHASOM BROWN, et al., individually and	Case No. 4:20-cv-03664-YGR-SVK
21	on behalf of themselves and all others similarly situated,	GOOGLE LLC'S ADMINISTRATIVE
22	Plaintiffs,	MOTION TO SEAL PORTIONS OF GOOGLE'S MOTION FOR SUMMARY
23	VS.	JUDGMENT
		Judge: Hon. Yvonne Gonzalez Rogers
24	GOOGLE LLC,	
25	Defendant.	
26		
27		
28		G N 100 00001 Y/CD CYW

Case No. 4:20-cv-03664-YGR-SVK

## I. INTRODUCTION

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Google LLC ("Google") respectfully seeks to seal certain portions of Google LLC's Motion for Summary Judgment ("Motion"), which contains non-public, highly sensitive and confidential business information that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including details related to Google's internal projects, internal databases, and logs, and their proprietary functionalities, as well as internal metrics, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. This information is highly confidential and should be protected.

Moreover, the Motion contains, reflects, or summarizes information designated by Plaintiffs as confidential under the terms of the Stipulated Protective Order (Dkt. 81). Google respectfully requests that this information, identified below, provisionally remain under seal. Pursuant to Civil Local Rule 79-5(f), Plaintiffs bear the responsibility to establish that such information is sealable.

This Administrative Motion pertains to the following information contained in the Motion:

Document	<b>Portions to be Filed</b>	Basis for Sealing
Document	Under Seal	Dusis for Seaming
Google LLC's Motion for Summary Judgment	Highlighted Portions at:	The information requested to be sealed contains Google's highly confidential and proprietary
	Pages 2:27-28, 6:17, 6:19, 7:4	information regarding highly sensitive features of Google's internal systems and operations, including various internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing

Case No. 4:20-cv-03664-YGR-SVK

1 2			as competitors may alter their systems and practices relating to competing
3			products. It may also place Google at an increased risk of cybersecurity
			threats, as third parties may seek to use the information to compromise
4			Google's internal practices relating to
5			competing products.
6	Statement of	Highlighted Portions	The information requested to be
7	Undisputed Facts	at:	sealed contains Google's highly confidential and proprietary
8		Pages 5:11, 5:21,	information regarding highly sensitive
9		6:10, 7:3, 10:7	features of Google's internal systems and operations, including various
10			types of Google's internal projects
11			and internal metrics, that Google maintains as confidential in the
			ordinary course of its business and is
12			not generally known to the public or Google's competitors. Such
13			confidential and proprietary
14			information reveals Google's internal strategies, system designs, and
15			business practices for operating and maintaining many of its important
16			services, and falls within the protected
17			scope of the Protective Order entered in this action. See Dkt. 81 at 2-3.
18			Public disclosure of such confidential
19			and proprietary information could affect Google's competitive standing
			as competitors may alter their systems
20			and practices relating to competing products. It may also place Google at
21			an increased risk of cybersecurity
22			threats, as third parties may seek to use the information to compromise
23			Google's internal practices relating to competing products.
24			competing products.
25	Broome Declaration	Highlighted Portions	Document contains information
26	Ex. 11	at:	designated by Plaintiffs as
27	Plaintiff William	Plaintiffs' Material	confidential and personally identifying.
28	Byatt's Objections		
ا ا ۵	and Responses to		

1	Defendant's Third	PDF Page 7:9-10,	
2	Set of Requests for Admission (Nos. 22-	7:12-13	
3	29)		
4	Broome Declaration Ex. 16	Highlighted Portions at:	Document contains information designated by Plaintiffs as
5	Plaintiff Chasom	Plaintiffs' Material	confidential and personally identifying.
6	Brown's Objections and Responses to	PDF Pages 4:13,	
7	Defendant's First Set of Interrogatories	4:17-19, 4:21, 7:5-7, 7:10	
8	(Nos. 1-6)		
9	Broome Declaration Ex. 17	Highlighted Portions at:	Document contains information designated by Plaintiffs as
10	Plaintiff William Byatt's Objections	Plaintiffs' Material	confidential and personally identifying.
11	and Responses to	PDF Pages 4:13-15,	
12	Defendant's First Set of Interrogatories	4:17-18, 4:20-21, 7:1- 2, 7:5	
13	(Nos. 1-6)	_,	
14	Broome Declaration Ex. 18	Highlighted Portions at:	Document contains information designated by Plaintiffs as
15	Plaintiff Christopher	Plaintiffs' Material	confidential and personally identifying
16	Castillo's Objections		, c
17	and Responses to Defendant's First Set	PDF Pages 4:13-15, 4:17-20, 4:22, 5:7,	
18	of Interrogatories (Nos. 1-6)	7:2-8	
19	Broome Declaration	Highlighted Portions	Document contains information
20	Ex. 19	at:	designated by Plaintiffs as confidential and personally
21	Plaintiff Jeremy Davis' Objections	Plaintiffs' Material	identifying.
22	and Responses to Defendant's First Set	PDF Pages 4:13, 4:16, 7:6	
23	of Interrogatories (Nos. 1-6)		
24	Broome Declaration	Highlighted Portions	Document contains information
25	Ex. 20	at:	designated by Plaintiffs as confidential and personally
26	Plaintiff Chasom Brown's Verified	Plaintiffs' Material	identifying.
27	Amended Objections	PDF Pages 4:6, 4:11,	
28	and Responses to Defendant's	5:10-13, 5:15-16,	

Interrogatories 1, 4 and 5	6:10-12, 6:15, 7:5-8, 7:11	
Broome Declaration Ex. 21	Highlighted Portions at:	Document contains information designated by Plaintiffs as
Plaintiff William Byatt's Verified	Plaintiffs' Material	confidential and personally identifying.
Amended Objectio	ns PDF Pages 4:6, 5:10-	
and Responses to	13, 5:15-16, 6:10-11,	
Defendant's Interrogatories 1, 4 and 5	6:14, 7:3-5, 7:8	
Broome Declaration	n Highlighted Portions	Document contains information
Ex. 22	at:	designated by Plaintiffs as confidential and personally
Plaintiff Christoph Castillo's Verified		identifying.
Amended Objection and Responses to	ns PDF Pages 4:6, 5:10- 18, 6:12-18, 7:7-14	
Defendant's Interrogatories 1, 4	.,	
and 5 Broome Declaration	n Highlighted Portions	Document contains information
Ex. 23	at:	designated by Plaintiffs as confidential and personally
Plaintiff Jeremy Davis' Verified	Plaintiffs' Material	identifying.
Amended Objectio and Responses to	ns PDF Pages 4:7, 5:10- 13, 5:15-17, 6:15,	
Defendant's	7:10	
Interrogatories 1, 4 and 5		
Broome Declaration Ex. 28	h Highlighted Portions at:	Document contains information designated by Plaintiffs as
DI : ('CC ) 5 .	D1 : ('CC 134 : 14	confidential and personally
Plaintiff Monique Trujillo's Objection		identifying.
and Responses to Defendant's First a	, , , , , ,	
Second Sets of Interrogatories (No	6:12-17, 7:11-13, 7:15	
3 & 10)	II' 11' 1 . 15	D
Broome Declaration Ex. 30	n Highlighted Portions at:	Document contains information designated by Plaintiffs as
William Byatt's	Plaintiffs' Material	confidential and personally identifying.

1	Responses to Defendant's Fourth	PDF Page 4:16-17, 4: 19-20	
2	Set of Interrogatories	19-20	
3	(Nos. 12–15)		
4	Broome Declaration Ex. 39	Highlighted Portions at:	Document contains information designated by Plaintiffs as confidential and personally
5	Plaintiffs' Objections and Responses to	Plaintiffs' Material	identifying.
6	Defendant's Sixth Set	7:11-13, 7:16-17,	
7	of Interrogatories (No. 17)	7:20, 8:2-3, 8:6-7, 12:24-13:1	
8	Broome Declaration Ex. 41	Highlighted Portions at:	The information requested to be sealed contains Google's highly
9	Defendant Google	Pages 4.7 4.26 6.17	confidential and proprietary
0	LLC's Objections and Responses to Plaintiffs' 7th Set of	Pages 4:7, 4:26, 6:17, 6:25-26, 7:13-14, 7:20, 7:27, 8:3-5,	information regarding highly sensitive features of Google's internal systems and operations, including various
1   2	Interrogatories (Nos. 21-29)	8:13-14, 8:19	types of Google's internal projects, identifiers and logs, and their
3			proprietary functionalities, as well as internal metrics, that Google
4			maintains as confidential in the ordinary course of its business and is
5			not generally known to the public or Google's competitors. Such
6			confidential and proprietary information reveals Google's internal
7			strategies, system designs, and
8			business practices for operating and maintaining many of its important
9			services, and falls within the protected scope of the Protective Order entered
)			in this action. See Dkt. 81 at 2-3.
1			Public disclosure of such confidential and proprietary information could
2			affect Google's competitive standing as competitors may alter their systems
3			and practices relating to competing
4			products. It may also place Google at an increased risk of cybersecurity
5			threats, as third parties may seek to use the information to compromise
6			Google's internal practices relating to
7	Broome Declaration	Highlighted Portions	Competing products.  The information requested to be
8	Ex. 45	at:	sealed contains Google's highly confidential and proprietary

1	June 16, 2021 Glenn	Pages 281:11,	information regarding highly sensitive
2	Berntson Deposition Transcript	372:11, 372:15	features of Google's internal systems and operations, including various
3			types of Google's internal projects, identifiers, and their proprietary
4			functionalities, that Google maintains as confidential in the ordinary course
5			of its business and is not generally
6			known to the public or Google's competitors. Such confidential and
7			proprietary information reveals
8			Google's internal strategies, system designs, and business practices for
9			operating and maintaining many of its
			important services, and falls within the protected scope of the Protective
10			Order entered in this action. See Dkt.
11			81 at 2-3. Public disclosure of such confidential and proprietary
12			information could affect Google's
13			competitive standing as competitors may alter their systems and practices
14			relating to competing products. It may
			also place Google at an increased risk of cybersecurity threats, as third
15			parties may seek to use the
16			information to compromise Google's
17			internal practices relating to competing products.
18	Broome Declaration	Highlighted Portions	The information requested to be
	Ex. 56	at:	sealed contains Google's highly
19	February 18, 2022	Page 277:5	confidential and proprietary information regarding highly sensitive
20	Rory McClelland Deposition Transcript		features of Google's internal systems
21	r		and operations, including Google's internal projects and identifiers that
22			Google maintains as confidential in
			the ordinary course of its business and is not generally known to the public or
23			Google's competitors. Such
24			confidential and proprietary information reveals Google's internal
25			strategies, system designs, and
26			business practices for operating and maintaining many of its important
27			services, and falls within the protected
28			scope of the Protective Order entered in this action. See Dkt. 81 at 2-3.
-3			in this action, See DRt. 01 at 2-3.

and proprietary information could affect Google's competitive standing as competitors may alter their syste and practices relating to competing products. It may also place Google an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating competing products.  Broome Declaration Ex. 57  Broome Declaration Ex. 57  Broome Declaration Transcript  Highlighted Portions at:  Pages 25:7, 25:14, 25:23-24, 26:3, 26:5-9, 27:10-11  Pages 25:10-11  Pages 25:10-11  Pages 25:10-11  Pages 25:14, 25:23-24, 26:3, 26:5-9, 27:10-11  Pages 25:10-11  Pages 25:10-11  Pages 25:10-11  Pages 25:10-11  Pages 25:14, 25:14, 25:23-24, 26:3, 26:5-9, 26:10-10				
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as competitors may alter their syste and practices relating to competing products. It may also place Google an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating competing products.  Broome Declaration Ex. 57  March 10, 2022 Stephen Chung 30(b)(6) Deposition Transcript  Pages 25:7, 25:14, 25:23-24, 26:3, 26:5-9, 27:10-11  Pages 25:7, 25:14, 25:23-24, 26:3, 26:5-9,	2			
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Broome Declaration Ex. 57  March 10, 2022 Stephen Chung 30(b)(6) Deposition Transcript  Pages 25:7, 25:14, 25:23-24, 26:3, 26:5- 9, 27:10-11  Pages 26:3, 26:5- 9, 27:10-11  Broome Declaration Ex. 57  March 10, 2022 Stephen Chung 30(b)(6) Deposition Transcript  Pages 25:7, 25:14, 25:23-24, 26:3, 26:5- 9, 27:10-11  Pages 26:3, 26:5- P	7			1
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Broome Declaration Ex. 57  Broome Declaration Ex. 55  Pages 25:7, 25:14, 25:23-24, 26:3, 26:5-9, 27:10-11  Pages 25:23-24, 26:3, 26:5-9, 26:24  Pages 25:				
8   Ex. 57   at: sealed contains Google's highly confidential and proprietary information regarding highly sensit features of Google's internal system and operations, including various types of Google's internal projects, and their proprietary functionalities that Google maintains as confidential in the ordinary course of its busines and is not generally known to the public or Google's competitors. Succonfidential and proprietary information reveals Google's internal projects, and their proprietary functionalities that Google maintains as confidential in the ordinary course of its busines and is not generally known to the public or Google's competitors. Succonfidential and proprietary information reveals Google's internal projects, and business practices for operating and maintaining many of its important services, and falls within the protect scope of the Protective Order enters in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their syste and practices relating to competing products. It may also place Google an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating competing products.  Broome Declaration Ex. 65  Broome Jeclaration Ex. 65  Broom	7	Prooma Dadaration	Uighlighted Portions	<del>                                     </del>
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10 Transcript  20 Sy. 27:10-11  21 Sy. 27:10-11  22 Sy. 27:10-11  23 System and operations, including various types of Google's internal projects, and their proprietary functionalities that Google maintains as confidenti in the ordinary course of its busines and is not generally known to the public or Google's competitors. Suconfidential and proprietary information reveals Google's internal projects, and their proprietary functionalities that Google maintains as confidenti in the ordinary course of its busines and is not generally known to the public or Google's competitors. Suconfidential and proprietary information reveals Google's internation operating and maintaining many of its important services, and falls within the protect scope of the Protective Order enters in this action. See Dkt. 81 at 2-3. Public disclosure of such confident and proprietary information could affect Google's competitive standing as competitors may alter their syste and practices relating to competing products. It may also place Google an increased risk of cybersecurity threats, as third garties may seek to use the information to compromise Google's internal practices relating competing products.  25 Broom Declaration Ex. 65  Broom - Google  26 Broom - Google  27 Seal Entirely  28 Seal Entirely  29 System designs, and business practices for Google internal projects, and their proprietary information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive for Google in the proprietary information regarding highly sensitive for Google internal proprietary information regarding highly sensitive for Google internal proprietary information regarding highly sensitive for Google internal proprietary information regarding highly sensitive for Google in the proprietary information regarding highly sensitive for Google in the proprietary information regarding highly sensitive for Google in the proprietary information regarding highly sensitive for Google in the proprietary information	9		Pages 25:7, 25:14,	information regarding highly sensitive
Transcript  9, 27:10-11  and operations, including various types of Google's internal projects, and their proprietary functionalities that Google maintains as confidenti in the ordinary course of its busines and is not generally known to the public or Google's competitors. Su confidential and proprietary information reveals Google's intern strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protect scope of the Protective Order entern in this action. See Dkt. 81 at 2-3. Public disclosure of such confident and proprietary information could affect Google's competitive standing as competitors may alter their system and practices relating to competing products. It may also place Google an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating competing products.  Broome Declaration  Ex. 65  Broome Declaration  Ex. 65  Brown - Google  Seal Entirely  Seal Entirely  and operations, including various types of Google's internal projects, and their proprietary functionalities that Google in the ordinary confidential and proprietary information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensity information regarding highly sensity information regarding highly sensity.	10		1	features of Google's internal systems
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4			known to the public or Google's
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14			parties may seek to use the information to compromise Google's
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15			competing products.
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18	Subscriber	Seal Entirely	information regarding highly sensitive features of Google's internal systems
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81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  Broome Declaration Ex. 68  Broome Declaration Ex. 68  Davis - Google Subscriber Information (GOOG-  Seal Entirely  Broome Declaration Ex. 68  Seal Entirely  Seal Entirely  Broome Declaration Ex. 68  Competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	1 /			
information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  Broome Declaration Ex. 68  Broome Declaration Ex. 68  Davis - Google Subscriber Information (GOOG-  Seal Entirely  information regarding highly sensitive features of Google's internal systems	18			
competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  Broome Declaration Ex. 68  Seal Entirely  Seal Entirely  Seal Entirely  Competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	19			± ± •
may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  Broome Declaration Ex. 68  Broome Declaration Ex. 68  Davis - Google Subscriber Information (GOOG-  Seal Entirely  may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	20			_
relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  Broome Declaration Ex. 68  Davis - Google Subscriber Information (GOOG-  Seal Entirely  relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	20			
also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  Broome Declaration Ex. 68  Davis - Google Subscriber Information (GOOG-  Seal Entirely  also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	21			, , , , , , , , , , , , , , , , , , ,
23   Davis - Google Subscriber Information (GOOG-   Signature   Seal Entirely   Information (GOOG-   Signature   S	22			
information to compromise Google's internal practices relating to competing products.  Broome Declaration Ex. 68  Broome Declaration Ex. 68  Davis - Google Subscriber Information (GOOG-  Seal Entirely  information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	22			of cybersecurity threats, as third
24   Internal practices relating to competing products.  Broome Declaration   Highlighted Portions   The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	23			-
25 Broome Declaration Ex. 68 Broome Declaration Ex. 68 Broome Declaration Ex. 68 Broome Declaration Broome Declaration Ex. 68 Broome Declaration B	24			
Broome Declaration Ex. 68  Davis - Google Subscriber Information (GOOG-  Broome Declaration Ex. 68  Highlighted Portions at:  Seal Entirely  Seal Entirely  Features of Google's internal systems				
Ex. 68 Davis - Google Subscriber Information (GOOG-  Ex. 68 at: Sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems	25	Broome Declaration	Highlighted Portions	
27 Subscriber Information (GOOG-	26			sealed contains Google's highly
Information (GOOG- teatures of Google's internal systems	27		Seal Entirely	information regarding highly sensitive
11 1 =	28	Information (GOOG-		

1			types of Google's internal identifiers
2			and logs, and their proprietary
_			functionalities, that Google maintains
3			as confidential in the ordinary course
			of its business and is not generally known to the public or Google's
4			competitors. Such confidential and
5			proprietary information reveals
			Google's internal strategies, system
6			designs, and business practices for
7			operating and maintaining many of its
			important services, and falls within
8			the protected scope of the Protective
9			Order entered in this action. See Dkt.
9			81 at 2-3. Public disclosure of such
10			confidential and proprietary information could affect Google's
11			competitive standing as competitors
11			may alter their systems and practices
12			relating to competing products. It may
			also place Google at an increased risk
13			of cybersecurity threats, as third
14			parties may seek to use the
			information to compromise Google's
15			internal practices relating to competing products.
16	Broome Declaration	Highlighted Portions	The information requested to be
	Ex. 69	at:	sealed contains Google's highly
17	T G 1		confidential and proprietary
18	Trujillo - Google Subscriber	Seal Entirely	information regarding highly sensitive
10	Information (GOOG-		features of Google's internal systems
19	BRWN-00229514)		and operations, including various
20			types of Google's internal identifiers
20			and logs, and their proprietary functionalities, that Google maintains
21			as confidential in the ordinary course
22			of its business and is not generally
22			known to the public or Google's
23			competitors. Such confidential and
			proprietary information reveals
24			Google's internal strategies, system
25			designs, and business practices for operating and maintaining many of its
			important services, and falls within
26			the protected scope of the Protective
27			Order entered in this action. See Dkt.
			81 at 2-3. Public disclosure of such
28			confidential and proprietary

1			information could affect Google's
			competitive standing as competitors
2			may alter their systems and practices
3			relating to competing products. It may
			also place Google at an increased risk
4			of cybersecurity threats, as third
5			parties may seek to use the
7			information to compromise Google's internal practices relating to
6			competing products.
_	Broome Declaration	Highlighted Portions	The information requested to be
7	Ex. 70	at:	sealed contains Google's highly
8			confidential and proprietary
	Log Data Usage Rules (GOOG-	Seal Entirely	information regarding highly sensitive
9	BRWN-00029004)		features of Google's internal systems
10			and operations, including various types of Google's internal policies,
11			logs, and identifiers, that Google
			maintains as confidential in the
12			ordinary course of its business and is
12			not generally known to the public or
13			Google's competitors. Such
14			confidential and proprietary
			information reveals Google's internal strategies, system designs, and
15			business practices for operating and
16			maintaining many of its important
			services, and falls within the protected
17			scope of the Protective Order entered
18			in this action. See Dkt. 81 at 2-3.
			Public disclosure of such confidential
19			and proprietary information could affect Google's competitive standing
20			as competitors may alter their systems
_			and practices relating to competing
21			products. It may also place Google at
22			an increased risk of cybersecurity threats, as third parties may seek to
23			use the information to compromise
			Google's internal practices relating to
24			competing products.
25	Broome Declaration	Highlighted Portions	The information requested to be
	Ex. 71	at:	sealed contains Google's highly
26	Device/App/Browser	Seal Entirely	confidential and proprietary information regarding highly sensitive
27	Fingerprinting and	Sear Entirely	features of Google's internal systems
41	Immutable Identifiers Policy (GOOG-		and operations, including various
28	BRWN-00029326)		types of Google's internal policies,

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1			logs, and identifiers, that Google
2			maintains as confidential in the
2			ordinary course of its business and is
3			not generally known to the public or
			Google's competitors. Such confidential and proprietary
4			information reveals Google's internal
5			strategies, system designs, and
			business practices for operating and
6			maintaining many of its important
7			services, and falls within the protected
´			scope of the Protective Order entered
8			in this action. See Dkt. 81 at 2-3.
			Public disclosure of such confidential
9			and proprietary information could
10			affect Google's competitive standing
			as competitors may alter their systems and practices relating to competing
11			products. It may also place Google at
12			an increased risk of cybersecurity
12			threats, as third parties may seek to
13			use the information to compromise
14			Google's internal practices relating to
14			competing products.
15	Broome Declaration	Highlighted Portions	The information requested to be
1.0	Ex. 75	at:	sealed contains Google's highly
16	April 15, 2022 Expert	Pages 25, 57-59, 73-	confidential and proprietary
17	Report of Bruce	75, 80, 83, 87, 89-91,	information regarding highly sensitive features of Google's internal systems
	Schneier	93, 96-97	and operations, including various
18		, , , , , , , ,	types of Google's internal projects,
19			identifiers, and their proprietary
			functionalities, as well as internal
20			metrics, that Google maintains as
21			confidential in the ordinary course of
<b>41</b>			its business and is not generally
	i i		
22			known to the public or Google's
			competitors. Such confidential and
22   23			competitors. Such confidential and proprietary information reveals
			competitors. Such confidential and proprietary information reveals Google's internal strategies, system
23 24			competitors. Such confidential and proprietary information reveals
23			competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within
23 24			competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
23 24 25 26			competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt.
23 24 25			competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
23 24 25 26			competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt.

1			competitive standing as competitors
2			may alter their systems and practices
			relating to competing products. It may also place Google at an increased risk
3			of cybersecurity threats, as third
4			parties may seek to use the
			information to compromise Google's
5			internal practices relating to
6	2 2 1		competing products.
	Broome Declaration Ex. 77	Highlighted Portions at:	The information requested to be
7	EA. //	at.	sealed contains Google's highly confidential and proprietary
8	April 15, 2022 Expert	Plaintiff's Material	information regarding highly sensitive
	Report of Jonathan E. Hochman	Paragraphs 88-90,	features of Google's internal systems
9	Hoemman	115, 174-78, 224-25,	and operations, including various
10		234, 236, 243, 246-	types of Google's internal projects,
		47,	identifiers, and their proprietary
11		Appendix B -	functionalities, as well as internal metrics, that Google maintains as
12		paragraphs 11-13, 18-	confidential in the ordinary course of
		23, pages 17-36	its business and is not generally
13		Appendix G -	known to the public or Google's
14		paragraphs 7-8, 24,	competitors. Such confidential and
		26	proprietary information reveals
15		Appendix H - TOC	Google's internal strategies, system designs, and business practices for
16		and paragraphs 1-41	operating and maintaining many of its
		Google Material	important services, and falls within
17		Google Material	the protected scope of the Protective
18		Pages 9, 36, 44-46,	Order entered in this action. See Dkt.
		51-56, 59, 61,63-71, 73-76, 82, 86-91, 93-	81 at 2-3. Public disclosure of such
19		96, 98-108, 110-112,	confidential and proprietary information could affect Google's
20		115-126, 128-132,	competitive standing as competitors
		134, 136-137, 139, 142, 145, 150, 152-	may alter their systems and practices
21		154	relating to competing products. It may
22		Appendix A - Pages	also place Google at an increased risk
20		3-4, 15, 19	of cybersecurity threats, as third parties may seek to use the
23			information to compromise Google's
24		Appendix D - Pages 1-5	internal practices relating to
25			competing products.
25		Appendix E - Seal	
26		entirely	Document contains information
27		Appendix F - Pages	designated by Plaintiffs as confidential and personally
27		2-10	identifying.
28		<u>l</u>	

1		Appendix G - Pages 1-6, 8-13	
2		Appendix H - Pages	
3		1-30	
4 5		Appendix I - Seal entirely	
6		Exhibit C - Seal entirely	
7		Exhibit E - Seal entirely	
8		onen ory	
9	Broome Declaration Ex. 79	Highlighted Portions at:	The information requested to be sealed contains Google's highly
10	May 20, 2022 Expert Report of Mark	Pages 59, 61	confidential and proprietary information regarding highly sensitive
11	Keegan: Rebuttal of Expert Report of	Exhibit 8 - Pages: Keegan_Exhibits_81,	features of Google's internal systems and operations, including various
12	Professor On Amir	Keegan_Exhibits_83- 87	types of Google's internal projects, identifiers, and their proprietary
13			functionalities, as well as internal
14			metrics and research, that Google maintains as confidential in the
15			ordinary course of its business and is not generally known to the public or
16			Google's competitors. Such
17			confidential and proprietary information reveals Google's internal
18			strategies, system designs, and business practices for operating and
19			maintaining many of its important services, and falls within the protected
20			scope of the Protective Order entered
21			in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential
22			and proprietary information could affect Google's competitive standing
23			as competitors may alter their systems and practices relating to competing
24			products. It may also place Google at
25			an increased risk of cybersecurity threats, as third parties may seek to
26			use the information to compromise Google's internal practices relating to
27			competing products.

28

1	Broome Declaration	Highlighted Portions	The information requested to be
	Ex. 80	at:	sealed contains Google's highly
2	June 7, 2022 Expert		confidential and proprietary
3	Rebuttal Report of	Pages 9, 53	information regarding highly sensitive
	Georgios Zervas,		features of Google's internal systems
4	PhD		and operations, including internal
اے			projects and their proprietary
5			functionalities, that Google maintains
6			as confidential in the ordinary course of its business and is not generally
			known to the public or Google's
7			competitors. Such confidential and
8			proprietary information reveals
8			Google's internal strategies, system
9			designs, and business practices for
10			operating and maintaining many of its
10			important services, and falls within
11			the protected scope of the Protective
			Order entered in this action. See Dkt.
12			81 at 2-3. Public disclosure of such
13			confidential and proprietary
13			information could affect Google's competitive standing as competitors
14			may alter their systems and practices
1.5			relating to competing products. It may
15			also place Google at an increased risk
16			of cybersecurity threats, as third
			parties may seek to use the
17			information to compromise Google's
18			internal practices relating to
		771 111 1 15 1	competing products.
19	Broome Declaration Ex. 81	Highlighted Portions	The information requested to be
20	LA. 61	at:	sealed contains Google's highly confidential and proprietary
20	June 7, 2022 Expert	Pages 35-37, 39-41	information regarding highly sensitive
21	Report of Professor	1 ages 33-31, 37-41	features of Google's internal systems
22	Paul Schwartz		and operations, including various
22			types of Google's internal policies,
23			identifiers and logs, and their
			proprietary functionalities, that
24			Google maintains as confidential in
25			the ordinary course of its business and
23			is not generally known to the public or
26			Google's competitors. Such
27			confidential and proprietary information reveals Google's internal
27			strategies, system designs, and
28			business practices for operating and
			business practices for operating and

1			maintaining many of its important
2			services, and falls within the protected scope of the Protective Order entered
3			in this action. See Dkt. 81 at 2-3.
			Public disclosure of such confidential and proprietary information could
4			affect Google's competitive standing
5			as competitors may alter their systems
6			and practices relating to competing products. It may also place Google at
7			an increased risk of cybersecurity
			threats, as third parties may seek to
8			use the information to compromise Google's internal practices relating to
9			competing products.
10	Broome Declaration Ex. 82	Highlighted Portions at:	The information requested to be sealed contains Google's highly
11	June 7, 2022 Expert	Pages 3-4, 22-24, 31-	confidential and proprietary information regarding highly sensitive
12	Report of Konstantinos	32, 38-43, 50-53, 58-	features of Google's internal systems
13	Psounis, PhD	59, 65-66, 73, 78, 87-	and operations, including various
		89, 94-95, 105, 107- 108, 110-112, 114,	types of Google's internal projects, identifiers and logs, and their
14		117, 175-184, 187-	proprietary functionalities, as well as
15		190	internal metrics, that Google
16			maintains as confidential in the ordinary course of its business and is
			not generally known to the public or
17			Google's competitors. Such
18			confidential and proprietary information reveals Google's internal
19			strategies, system designs, and
20			business practices for operating and
20			maintaining many of its important services, and falls within the protected
21			scope of the Protective Order entered
22			in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential
23			and proprietary information could
			affect Google's competitive standing
24			as competitors may alter their systems
25			and practices relating to competing products. It may also place Google at
26			an increased risk of cybersecurity
27			threats, as third parties may seek to use the information to compromise
			Google's internal practices relating to
28			competing products.

1	Broome Declaration Ex. 83	Highlighted Portions at:	The information requested to be sealed contains Google's highly
2		at.	confidential and proprietary
3	August 4, 2022 Declaration of Glenn	Pages 19:21-23,	information regarding highly sensitive
3	Berntson regarding	20:20-24, 21:1-7	features of Google's internal systems
4	Google Ad Manager		and operations, including various
5	and Google Adsense		types of Google's internal projects, identifiers and logs, and their
			proprietary functionalities, as well as
6			internal metrics, that Google
7			maintains as confidential in the
			ordinary course of its business and is not generally known to the public or
8			Google's competitors. Such
9			confidential and proprietary
10			information reveals Google's internal
10			strategies, system designs, and
11			business practices for operating and maintaining many of its important
12			services, and falls within the protected
			scope of the Protective Order entered
13			in this action. See Dkt. 81 at 2-3.
14			Public disclosure of such confidential
1.5			and proprietary information could affect Google's competitive standing
15			as competitors may alter their systems
16			and practices relating to competing
17			products. It may also place Google at
1 /			an increased risk of cybersecurity threats, as third parties may seek to
18			use the information to compromise
19			Google's internal practices relating to
			competing products.
20	Broome Declaration Ex. 85	Highlighted Portions	The information requested to be
21	LA. OJ	at:	sealed contains Google's highly confidential and proprietary
22	August 5, 2022	Plaintiff Material	information regarding highly sensitive
22	Declaration of Jonathan McPhie		features of Google's internal systems
23	Regarding Google's	Pages 22:21, 22:23,	and operations, including various
24	Disclosures	22:25, 23:2, 23:4, 23:6	types of Google's internal projects,
2 <del>1</del>		23.0	identifiers and logs, and their proprietary functionalities, as well as
25		Google Material	internal metrics, that Google
26			maintains as confidential in the
		Pages 16:15, 16:18,	ordinary course of its business and is
27		16:25, 23:10, 23:14, 25:8, 26:11-12, 29:3,	not generally known to the public or Google's competitors. Such
28		23.0, 20.11-12, 27.3,	confidential and proprietary
		1	1 T J

29:5-14, 32:5, 32:22, 33:10  29:5-14, 32:5, 32:22, information reveals Go strategies, system desig business practices for o maintaining many of its services, and falls within scope of the Protective in this action. See Dkt. Public disclosure of such and proprietary information designated  8  9  10  10  11  12  12  13  29:5-14, 32:5, 32:22, information reveals Go strategies, system desig business practices for o maintaining many of its services, and falls within scope of the Protective in this action. See Dkt. Public disclosure of such and proprietary information designated  and proprietary information affect Google's competent as competitors may alter and practices relating to products. It may also plus an increased risk of cybes threats, as third parties use the information to competing products.  The document also continformation designated	ns, and perating and important important or the protected Order entered 81 at 2-3. In confidential tion could itive standing or their systems of competing ace Google at ersecurity
business practices for o maintaining many of its services, and falls within scope of the Protective in this action. See Dkt. Public disclosure of such and proprietary information affect Google's competent as competitors may alter and practices relating to products. It may also plan increased risk of cyber threats, as third parties use the information to competing products.  The document also competing products.  The document also compinion maintaining many of its services, and falls within services, an	perating and important important in the protected Order entered 81 at 2-3. In confidential tion could itive standing in their systems is competing ace Google at ersecurity
maintaining many of its services, and falls within scope of the Protective in this action. See Dkt. Public disclosure of such and proprietary information disconsulation affect Google's compet as competitors may alter and practices relating to products. It may also plan increased risk of cyber threats, as third parties use the information to competing products.  The document also coninformation designated	important in the protected Order entered 81 at 2-3. In confidential tion could itive standing in their systems is competing ace Google at ersecurity
services, and falls within scope of the Protective in this action. See Dkt. Public disclosure of such and proprietary information affect Google's competent as competitors may alter and practices relating to products. It may also plan increased risk of cyber threats, as third parties use the information to a Google's internal practice competing products.  The document also compinformation designated	on the protected Order entered 81 at 2-3. In confidential tion could itive standing or their systems of competing ace Google at ersecurity
scope of the Protective in this action. See Dkt. Public disclosure of suct and proprietary information affect Google's compett as competitors may alter and practices relating to products. It may also plan increased risk of cyber threats, as third parties use the information to Google's internal practice competing products.  The document also coninformation designated	Order entered 81 at 2-3. h confidential tion could attive standing r their systems competing ace Google at ersecurity
in this action. See Dkt. Public disclosure of such and proprietary information affect Google's competent as competitors may alter and practices relating to an increased risk of cyber threats, as third parties a use the information to a Google's internal practices competing products.  The document also competing of the document also competing products.	81 at 2-3. h confidential tion could itive standing r their systems competing ace Google at ersecurity
Public disclosure of such and proprietary information affect Google's competent as competitors may alter and practices relating to products. It may also plean increased risk of cyber threats, as third parties a use the information to competing products.  The document also competing nation designated	h confidential tion could itive standing r their systems competing ace Google at ersecurity
and proprietary information affect Google's compete as competitors may alter and practices relating to an increased risk of cyber threats, as third parties use the information to a Google's internal practice competing products.  The document also competing nation designated	tion could itive standing r their systems competing ace Google at ersecurity
affect Google's competer as competitors may alter and practices relating to products. It may also plean increased risk of cybrid threats, as third parties a use the information to competing products.  The document also competing of the document also competing products.	itive standing r their systems competing ace Google at ersecurity
and practices relating to products. It may also please an increased risk of cyber threats, as third parties a use the information to a Google's internal practice competing products.  The document also compinion designated	competing ace Google at ersecurity
and practices relating to products. It may also plean increased risk of cyber threats, as third parties use the information to competing products.  The document also compinformation designated	ace Google at ersecurity
an increased risk of cybes threats, as third parties a use the information to a Google's internal practic competing products.  The document also compinformation designated	ersecurity
threats, as third parties a use the information to a Google's internal practic competing products.  The document also compined information designated	
use the information to concern a graduate of Google's internal practice competing products.  The document also concern information designated	nay seek to
Google's internal practic competing products.  The document also competing information designated	-
competing products.  The document also cominformation designated	-
The document also con information designated	
information designated	
as confidential and pers	•
identifying	Sharry
Broome Declaration Highlighted Portions The information reques	ted to be
15 Ex. 87 at: sealed contains Google	
Confidential and proprie	•
August 5 2022 Seal Entirety information regarding t	
Declaration of Teatures of Google's int	-
Jonathan McPhie  Regarding Google's interru	-
18 Disclosures (GOOG- identifiers and logs, and	1 0
19 CABR-05435660) proprietary functionalit	
internal metrics, that Go	_
20 maintains as confidenti	
ordinary course of its b	
Google's competitors	
22 confidential and proprie	
information reveals Go	
strategies, system desig	ns, and
business practices for o	
maintaining many of its	-
services, and rans with	
26 scope of the Protective in this action. See Dkt.	
27 Public disclosure of suc	3 L AL 73
and proprietary information	
28 affect Google's compet	h confidential

1			as competitors may alter their systems
$_{2}$			and practices relating to competing
_			products. It may also place Google at
3			an increased risk of cybersecurity threats, as third parties may seek to
4			use the information to compromise
4			Google's internal practices relating to
5			competing products.
	Broome Declaration	Highlighted Portions	The information requested to be
6	Ex. 88	at:	sealed contains Google's highly
7	Exhibit 17 to the		confidential and proprietary
	August 5, 2022	Seal Entirely	information regarding highly sensitive
8	Declaration of		features of Google's internal systems
9	Jonathan McPhie		and operations, including various types of Google's internal projects,
	Regarding Google's Disclosures		identifiers and logs, and their
10	21001000100		proprietary functionalities, as well as
11			internal metrics, that Google
11			maintains as confidential in the
12			ordinary course of its business and is
12			not generally known to the public or
13			Google's competitors. Such
14			confidential and proprietary
_			information reveals Google's internal strategies, system designs, and
15			business practices for operating and
16			maintaining many of its important
			services, and falls within the protected
17			scope of the Protective Order entered
18			in this action. See Dkt. 81 at 2-3.
			Public disclosure of such confidential
19			and proprietary information could
20			affect Google's competitive standing
20			as competitors may alter their systems and practices relating to competing
21			products. It may also place Google at
22			an increased risk of cybersecurity
22			threats, as third parties may seek to
23			use the information to compromise
_			Google's internal practices relating to
24	1/20/21 15	TT' 11' 1 . 1D .'	competing products.
25	4/29/21 Monsees Depo Transcript	Highlighted Portions at:	The information requested to be sealed contains Google's highly
	Excerpt	at.	confidential and proprietary
26	•	Page 86:14-15, 20-22	information regarding highly sensitive
27			features of Google's internal systems
			and operations, including various
28			types of Google's internal policies and

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logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

## II. LEGAL STANDARD

A party seeking to seal material must "establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law" (*i.e.*, is "sealable"). Civ. L.R. 79-5(b). The sealing request must also "be narrowly tailored to seek sealing only of sealable material." *Id*.

In the context of dispositive motions, materials may be sealed in the Ninth Circuit upon a showing that there are "compelling reasons" to seal the information. *See Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1179-80 (9th Cir. 2006). Quoting the Supreme Court's decision in *Nixon v. Warner Communications*, the Ninth Circuit has noted that examples of what might constitute a compelling reason include "sources of business information that might harm a litigant's competitive standing." *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1097 (9th Cir. 2016) (quoting 435 U.S. 589, 598-99 (1978)). The materials that Google seeks to seal here easily meet the "compelling reasons" standard.

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## III. THE ABOVE IDENTIFIED MATERIALS SHOULD ALL BE SEALED

Courts have repeatedly found it appropriate to seal documents that contain "business information that might harm a litigant's competitive standing." *Nixon*, 435 U.S. at 589-99. Materials that could harm a litigant's competitive standing may be sealed under the "compelling reasons" standard. *See e.g.*, *Icon-IP Pty Ltd. v. Specialized Bicycle Components, Inc.*, 2015 WL 984121, at \*2 (N.D. Cal. Mar. 4, 2015) (information "is appropriately sealable under the 'compelling reasons' standard where that information could be used to the company's competitive disadvantage") (citation omitted). Courts in this district have also determined that motions to seal may be granted as to potential trade secrets. *See, e.g. United Tactical Sys., LLC v. Real Action Paintball, Inc.*, 2015 WL 295584, at \*3 (N.D. Cal. Jan. 21, 2015) (rejecting argument against sealing "that [the party] ha[s] not shown that the substance of the information . . . amounts to a trade secret").

Here, the compelling reason standard is satisfied. The Motion comprises confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations that Google does not share publicly. Specifically, this information provides details related to Google's internal projects, internal databases, and logs, and their proprietary functionalities, specifically relating to Google's anti-fraud measures. Such information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services while complying with its legal and privacy obligations.

Public disclosure of the above-listed information would harm Google's competitive standing it has earned through years of innovation and careful deliberation, by revealing sensitive aspects of Google's proprietary systems, strategies, and designs to Google's competitors. That alone is a proper basis to seal such information. *See, e.g., Free Range Content, Inc. v. Google Inc.*, No. 14-cv-02329-BLF, Dkt. No. 192, at 3-9 (N.D. Cal. May 3, 2017) (granting Google's motion to seal certain sensitive business information related to Google's processes and policies to ensure the integrity and security of a different advertising system); *Huawei Techs., Co. v. Samsung Elecs. Co.*, No. 3:16-cv-02787-WHO, Dkt. No. 446, at 19 (N.D. Cal. Jan. 30, 2019) (sealing confidential sales data because "disclosure would harm their competitive standing by giving competitors insight they do not have");

1 Delphix Corp. v. Actifio, Inc., No. 13-cv-04613-BLF, 2014 WL 4145520, at \*2 (N.D. Cal. Aug. 20, 2 2014) (sealing "highly sensitive information regarding Delphix's product architecture and 3 development"); Trotsky v. Travelers Indem. Co., 2013 WL 12116153, at \*8 (W.D. Wash. May 8, 2013) (granting motion to seal as to "internal research results that disclose statistical coding that is 4 5 not publicly available"). Moreover, if publicly disclosed, malicious actors may use such information to seek to 6 7 compromise Google's infrastructure. Google and its users would be placed at an increased risk of 8 cyber security threats, and data related to its users could similarly be at risk. See, e.g., In re Google 9 Inc. Gmail Litig., 2013 WL 5366963, at \*3 (N.D. Cal. Sept. 25, 2013) (sealing "material 10 concern[ing] how users' interactions with the Gmail system affects how messages are transmitted" because if made public, it "could lead to a breach in the security of the Gmail system. The security 11 12 threat is an additional reason for this Court to seal the identified information. 13 The information Google seeks to redact, including information related to Google's internal 14 projects, internal databases, and logs, and their proprietary functionalities, as well as internal metrics 15 is the minimal amount of information needed to protect its internal systems and operations from 16 being exposed to not only its competitors but also to nefarious actors who may improperly seek 17 access to and disrupt these systems and operations. The "good cause" rather than the "compelling 18 reasons" standard should apply but under either standard, Google's sealing request is warranted. 19 IV.

## CONCLUSION

For the foregoing reasons, the Court should seal the identified portions of the Motion.

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	DATED: March 21, 2023	QUINN EMANUEL URQUHART &
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